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***UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA***

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

COREY WYLIE BROWN,

Defendant.

2:17-mj-00678-CWH

**STIPULATION FOR A
PROTECTIVE ORDER**

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the public, or any third party not directly related to this case, any documents, recordings, or other tangible things produced by the Government during discovery. The parties state as follows:

1. The Complaint in this case was filed June 29, 2017, charging the Defendant with Operating a Motor Vehicle Under the Influence of Drugs, Resulting in Death or Serious Bodily Injury and Operating a Motor Vehicle with a Controlled Substance in Blood.

1 2. The preliminary hearing is currently set for August 28, 2017. The
2 Government desires and intends to continue producing discovery, as soon as possible.

3 3. The discovery in this case includes multiple recorded interviews and
4 handwritten statements by witnesses, as well as photographs of the scene and of the
5 deceased victim. The Government believes that dissemination of the discovery in this
6 case could reveal the personal identifying information of various witnesses as well as the
7 deceased victim.

8 4. In order to protect the personal identifying information of witnesses and
9 the deceased victim, the parties intend to restrict access to the discovery in this case to
10 the following individuals: the defendant, attorneys for the parties, and any personnel
11 that the attorneys for the parties consider necessary to assist in performing that
12 attorneys' duties in the prosecution or defense of this case, including investigators,
13 paralegals, experts, support staff, interpreters, and any other individuals specifically
14 authorized by the Court (collectively, the "Covered Individuals").

15 5. Without leave of Court, the Covered Individuals shall not:

- 16 a. make copies for, or allow copies of any kind to be made by any other
17 person of the discovery in this case;
18 b. allow any other person to read, listen, or otherwise review the
19 discovery;
20 c. use the discovery for any other purpose other than preparing to
21 defend against or prosecute the charges in the Complaint or any
22 further Indictment arising out of this case; or
23 d. attach the discovery to any of the pleadings, briefs, or other court
24 filings except to the extent those pleadings, briefs, or filings are filed
under seal.

1 6. Nothing in this stipulation is intended to restrict the parties' use or
2 introduction of the discovery as evidence at the preliminary hearing, before the grand
3 jury, at trial, or as support in motion practice.

4 7. The parties shall inform any person to whom disclosure may be made
5 pursuant to this order of the existence and terms of this Court's order.

6 8. Should a reasonable need for this protective order cease to exist, on grounds
7 other than a Covered Individual or some other person violating or circumventing its
8 terms, the Government will move expeditiously for its dissolution.

9 9. The defense hereby stipulates to this protective order.
10

11 Respectfully submitted,
12 For the United States:

13 STEVEN W. MYHRE
14 Acting United States Attorney

15 _____
 /s/
16 CHRISTOPHER BURTON
17 Assistant United States Attorney

18 For the Defense:

19 _____
 /s/ *Roy L. Nelson* ¹⁶¹
20 Roy L. Nelson, Esq.
21 Attorney for COREY WYLIE BROWN

22 **IT IS SO ORDERED:**

23 _____
 Carl W. Hoffman
24 CARL W. HOFFMAN
 United States Magistrate Judge

 August 9, 2017

 Date